



3.1 (16)	Managing risks at mines	Requiring the competent person to conduct the risk assessment may prevent the competent person from fully engaging with and contributing to the risk assessment. While use of a facilitator is good practice there may be times when a facilitator is not available. Suggest removal of ", or possibly conduct"
4.4.1 (28)	Injury to persons	The dot point that states "ropes associated with plant and structures" - is this targeted at winders and elevators, draglines or shovels, if so state this, otherwise, why have ropes been included and no other devices such as chains included.
4.5.2.3 (33)	Maintenance and Repair	<p>Requires a MECP to implement a preventative maintenance system. At a large coal operation a system such as this transcends mechanical engineering and applies to the whole site. Suggest that "implement" should change to "be involved in the implementation of"</p> <p>This section prevents any improvement to maintenance schedules as "must be carried out: a) in accordance with OEM specifications". Suggest changing to b) "if there are no manufacturer's recommendations OR THEY ARE INAPPROPRIATE, in accordance with the recommendations of a competent person"</p> <p>Recent developments such as reliability centred maintenance may result in a more appropriate and safer strategy, particularly when applied to older plant or plant from OEM's who have not developed their strategy from such a rigorous base.</p>
4.5.3 (34)	Introduction of Plant or Structures into the mine	The statement "the mechanical tradesperson carrying out the day to day introduction to site inspection" needs to be revised to allow others such as specialist contractors, engineers and supervisors to carry out the inspections. SUGGEST changing "mechanical tradesperson" to "competent person"
4.5.4 (36)	Safe Systems of Work	The example given may result in interpretation that relying on competency can only be applied in low energy tasks. Tasks can be carried out safely on high energy systems with the correct training and competency, i.e. by use of high integrity isolation systems. Suggest separating the 2 examples and numbering to separate into 2 distinct scenarios.
4.5.7.1 (39)	Diesel Engine Pollutants	See 4.5.7.3 regarding specific issues related to emissions-based maintenance strategy
4.5.7.1 (40)	Diesel Engine Pollutants	With regard to dot points listing "matters that should be considered to minimise the risks from emissions" some of these are beyond the control of the MEM and lie with the ventilation officer. SUGGEST removal of points 1,2,5.



4.5.7.3 (40)	Emissions-based maintenance strategy	<p>The inclusion of an emissions based maintenance strategy exceeds the intent of WHS (mines) Regulation CI53 a) which states emissions must be "sampled and analysed". CI52 c) states engines must be maintained but does not direct that the maintenance strategy is to be driven from emissions testing.</p> <p>The directive to adopt an emissions based maintenance strategy contradicts the statement in Section 4.5.2.3 requiring adoption of OEM maintenance schemes. Information of this nature should remain in MDG29 and the review currently underway completed and a revised version published.</p> <p>The requirements of an emissions based strategy may exceed the available resources for some mines, particularly those on care and maintenance or small fleet/production mines.</p> <p>The requirement to test every engine at 6 monthly intervals by a NATA laboratory to validate the testing carried out by the mine is not required, a simple spot audit of a percentage of diesel engines will validate the testing carried out by the mine or identify any variance. Also, consideration of 3 monthly intervals as opposed to 6 monthly is excessive and will add little value to the maintenance strategy.</p>
4.5.14 (51)	Hot Work	Review first paragraph to align with definition of hot work as stated in CI3 of WHS (Mines) Regulations 2014
4.5.16.1 (52)	Risks with belt conveyors	With regard to statement regarding risk of material falling from conveyor SUGGEST inclusion of "barriers" as underguarding of gantry conveyors is impractical and creates additional hazards when the primary hazard can be controlled by restricting access under that section of the conveyor.
5.2.4 (62)	Methane Monitors	This section requires review to clarify what percentage alarm and trip points are so that it mirrors WHS (Mines) Regulation 2014.
5.2.5 (63)	Use of Internal Combustion engines that are not explosion-protected	Include clarification that CI81 only applies to the underground environment not the entire mine.